

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
NORTHERN DIVISION**

CHAE BROTHERS LIMITED  
LIABILITY COMPANY, *et al.*,

Plaintiffs,

v.

MAYOR & CITY COUNCIL OF  
BALTIMORE, *et al.*,

Defendants.

\* \* \* \* \*

**JOINT MOTION  
TO MODIFY SCHEDULING ORDER**

All Plaintiffs (“Plaintiffs”) and Defendant Mayor and City Council of Baltimore (“the City” and, collectively with Plaintiffs, the “Parties”), by and through their respective undersigned counsel, hereby jointly move to extend two deadlines set forth in this Court’s Order entered on February 8, 2021 [ECF No. 121], and in support thereof, state as follows:

1. On February 8, 2021, this Court approved the following briefing schedule:

Motions for Summary Judgment: April 9, 2021

Oppositions to Motions: June 9, 2021

Reply Motions: July 9, 2021

2. The Parties respectfully request that this Court extend the deadlines for the Opposition and Reply Motions, as more specifically set forth below.

3. The City filed its Motion for Summary Judgment as due on April 9, 2021.

4. On May 21, 2021, the City’s e-discovery coordinator, without authorization, deleted the entire project for this case from the City’s e-discovery platform. The project consisted

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of some 800,000 documents, which had been reviewed by City attorneys over more than a year, and tagged appropriately. The deletion is largely irreversible, although the City is paying the company in order to try to recover the data.

5. Counsel for Plaintiffs has agreed to produce the City's discovery productions back to it. While this is extremely helpful, the City will still need to re-review thousands of documents to locate and flag necessary and relevant documents for its reply to Plaintiff's upcoming opposition motion.

6. Accordingly, counsel for Plaintiffs has agreed to an extension for the City's reply, subject to this Court's approval.

7. Due to counsel's consideration for the City's issues and the fact that he has numerous trials scheduled just before the Plaintiffs' due date, counsel for the City also agreed to an extension for the opposition, subject to this Court's approval.

8. Accordingly, for the foregoing reasons, the Parties jointly request that this Court extend the deadlines in the Order as follows:

Oppositions to Dispositive Motions: June 28, 2021

Reply Motions: August 23, 2021

Date: June 3, 2021

Respectfully submitted,

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*Counsel for Defendant Mayor and City Council of  
Baltimore*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was filed with the ECF system on June 3, 2021 in accordance with the established rules and procedures.

/s/ Sara E. Gross